



# Interpretation

## Section 41.

### Supply and communications systems—Rules for employers

#### **Rule 410A3 General Requirements—General (2007 Edition, page 246) (14 January 2009) IR558**

Does the term “potential exposure” mean “any possible exposure” or does it mean “an exposure with a strong possibility of occurring?”

**Discussion:** The question arises because some people interpret the term “potential exposure” as meaning “any possible exposure” while others interpret it as meaning an exposure with some greater likelihood of occurring.

The differing interpretations of “potential exposure” come about because the word “potential” has two primary meanings. The problem is that the Rule makes literal sense with either meaning, although one is far more fair and consistent with traditional tests. *Webster’s Third New International Dictionary* gives the first primary meaning of “potential” as “existing in possibility.” The second primary meaning is “having the capacity or a strong possibility for development into a state of actuality.”

In the Rule, therefore, “potential exposure” can be interpreted as “any exposure existing in possibility” or it can be interpreted as “an exposure with a strong possibility” of actually occurring. After 1 January 2009, these differences in interpretation almost certainly will result in differences in application of the Rule.

### **Interpretation**

The Interpretations Subcommittee has considered the subject Interpretation Request for Rule 410A3 and has developed a consensus report as follows:

“See IR557.” From IR557: “The Rule 410A3 phrase ‘on or near energized parts or equipment’ includes conductors. In answer to the specific question, the Rule applies to energized insulated conductors (cables) in manholes as well as to overhead plant energized facilities.

Employees working on a de-energized cable in a manhole may or may not require flash protection because of exposure to other energized cables or equipment in the manhole. Rule 410A3 requires an assessment of the potential for an electric arc and the wearing of protective clothing as appropriate. The employer is responsible for determining potential employee exposure, based on what activities will occur and to what extent such activities may potentially initiate an arc.

While it is theoretically possible for an arc to occur whenever parts or equipment are energized, the likelihood—in part—is typically dependent upon the work being performed on energized facilities. Methods for determining potential employee exposure to arc hazards are normally site-specific and beyond the scope of this request for interpretation.”